AO 91 (Rev. 11/11) Criminal Complaint			<u>El</u>	LED_	
U	NITED STAT	ES DISTRICT COUR	${ m T}$	luerque NM	
	for the				
District of New		t of New Mexico	APR 2 2 2016 MATTHEW J. DYKMAN CLERK		
77 to 100 c			WATTHEW	J. DYKMAA.	
United States of America v.))		
Stephanie Romero) Case No. 16- ΥΥ	T-1757	•	
,) 10-11	ין פין יא		
)			
Defendant(s))			
Dejendum(s)					
	CRIMINA	AL COMPLAINT			
I, the complainant in this	case, state that the fol	llowing is true to the best of my k	nowledge and belie	f.	
On or about the date(s) of	April 21, 2016	in the county of	Bernalillo	in the	
District of	New Mexico	, the defendant(s) violated:			
Code Section		Offense Description	ı		
18 U.S.C. 1704 and 1708	_	Keys or locks stolen or reproduced, Theft or receipt of stolen mail matter generally			
	9 • • • • • • • • • • • • • • • • • • •				
This criminal complaint	is based on these facts	S:			
See attached affidavit					
☑ Continued on the atta	ched sheet.				
\sim \sim					
		- Kyn like	plainant's signature		
		^		n en o otor	
			nited States Postal I	nspector	
Sworn to before me and signed in	n my presence.			\neg	
	1. 11	Pos			
Date: 04/22/2016		Vulla	udge's signature	8	
A	Ibuquaraua NIM		istrate Judge Willia	m P. Lynch	
City and state:	lbuquerque, NM		nted name and title	III. Lynoli	

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

United States of America,

Plaintiff.

VS.

Stephanie ROMERO,

Defendant.

AFFIDAVIT

I, Ryan Calvert, being duly sworn, hereby depose and state the following:

INTRODUCTION AND AGENT BACKGROUND

- 1. I am a United States Postal Inspector with the United States Postal Inspection Service ("USPIS"), currently assigned to the Albuquerque Domicile, and have been so employed since June 2013. During that time, I have been trained to work on numerous federal criminal investigations. I have worked with other inspectors, agents, police officers, and law enforcement personnel who have extensive criminal investigative experience and training.
- 2. The information contained in this affidavit is not an exhaustive account of everything I know about this case. Rather, it contains only the facts that I believe are necessary to establish probable cause in support of a criminal complaint against Stephanie ROMERO for a violation of 18 U.S.C. §§ 1704, Keys or Locks Stolen or Reproduced and 1708, Theft or Receipt of Stolen Mail Matter Generally.
- 3. The information contained within the affidavit is based on my training and experience, as well as information imparted to me by other law enforcement officers involved in this investigation.

DETAILS OF INVESTIGATION

4. On April 4, 2016, I received a mail theft complaint from L.Z. who stated her mail was compromised. I spoke with L.Z. who stated there is a cluster mailbox near her home where she receives her mail. She stated she has not seen any damage to the box recently, but did see it open about a week prior. She stated she has a credit card account with Chase and they had sent out credit card convenience checks. She stated a convenience check was stolen and written against her account for \$7,000. She stated she never wrote the check and did not give anyone permission to have the check. She stated she has since closed that account. This cluster mailbox is located at a different address than the other victims. It is suspected that a stolen or counterfeit USPS Arrow Key was used to open the

- box. A USPS Arrow Key is a "skeleton key" of sorts and allows the user to access USPS cluster mailboxes.
- 5. On April 4, 2016, I spoke with Katrina Cox, Investigator for Chase Bank, regarding the account belonging to L.Z. She stated the account was closed and provided me with a copy of the check. Check #101698 was made payable to John Hyde for \$7,000, and deposited into an account with State Employees Credit Union (SECU) on March 22, 2016.
- 6. On April 13, 2016, Albuquerque Police (APD) Detective Jesse Carter and I interviewed a person ("source") who stated they had information about postal keys and mail theft. The source stated Stephanie Romero has a counterfeit USPS Arrow Key. The source stated that Stephanie Romero is staying at hotels and is stealing mail. The source stated Stephanie Romero is also making checks in her various hotel rooms, and that the source has seen printers, computers and check stock paper. The source stated they last saw Stephanie Romero at the Travelodge behind the Super 8 Motel on University. The source was shown a picture of Stephanie Romero to assist law enforcement in recognizing her.
- 7. On April 15, 2016, I spoke with Gerald Rivera, Risk Operations Specialist for SECU, regarding the L.Z. check deposited into Mr. Hyde's account. He stated he received the video from the deposit ATM and provided me still shots of persons in a grey truck, depositing the stolen check. When I observed the pictures, I recognized a female in the passenger seat matching the description of Stephanie Romero. Mr. Rivera stated there were two other checks deposited into the account; Check #1016 drawn on the account of J.M., made payable to John Hyde for \$4867, and Check #7545, made payable to J.C. for \$3,099. He provided me copies of these checks and is working on obtaining ATM video of these deposits as well.
- 8. On April 18, 2016, I received information from the source stating that Stephanie Romero was staying in at the America's Best Value Inn located at 2108 Menaul Blvd NE, Room 246, Albuquerque, NM 87107. I spoke with Sujit Twayana, the front desk clerk of the motel. I showed him a picture of Ms. Romero and he stated he recognized her and stated she was currently staying there. Mr. Twayana stated Romero had checked into Room 276 under her name and is paying cash. He stated there is no Room 246. He stated she has been at the hotel since April 8, 2016, and was living in Room 277 before that, since April 2, 2016. He stated a male, Michael Romero, is also staying in the room.
- 9. On April 21, 2016, U.S. Postal Inspectors with Homeland Security Agents executed a federal search warrant at 2108 Menaul Blvd NE, Room 276, Albuquerque, NM 87107. A counterfeit USPS Arrow Key, counterfeit checks bearing Ms. Romero's name, stolen mail and multiple credit and debit cards in names other than Ms. Romero's were seized. Inspectors R. Calvert and S. Herman interviewed Stephanie Romero. Ms. Romero admitted to possessing the key, she admitted to stealing mail to look for personal identifying information and gift cards and admitted to depositing the check from L.Z.'s Chase account on March 22, 2016.

CONCLUSION

10. Based on the aforementioned facts, I believe there is probable cause in the District of New Mexico, Stephanie Romero committed a violation of 18 U.S.C. §§ 1704, Keys or Locks Stolen or Reproduced and 1708, Theft or Receipt of Stolen Mail Matter Generally.

Ryan Calvert

United States Postal Inspector

Subscribed and sworn to before me this 22nd day of April, 2016.

Honorable William P. Lynch United States Magistrate Judge